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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
DIVISION

Vincent King Chambers
#150286

(Write the full name of the plaintiff in this action.
Include prisoner registration number.)

v.

Lt. Thompson
Lt. Stevenson
Lt. O'Bryan

(Write the full name of each defendant. The caption
must include the names of all of the parties.
Fed. R. Civ. P. 10(a). Merely listing one party and
writing "et al." is insufficient. Attach additional
sheets if necessary.)

Case No: _____
(to be assigned by Clerk of District Court)

Plaintiff Requests Trial by Jury
☒ Yes ☐ No

PRISONER CIVIL RIGHTS COMPLAINT UNDER 42 U.S.C. § 1983

NOTICE:

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor, or a complete financial account number. A filing may include only: the last four digits of a social security number, the year of an individual's birth, a minor's initials, and the last four digits of a financial account number.

Except as noted in this form, plaintiff should not send exhibits, affidavits, witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed without prepayment of fees and costs.

I. The Parties to this Complaint

A. The Plaintiff

Name: Vincent King Chambers

Other names you have used: King St. North

Prisoner Registration Number: 150286

Current Institution: St. Louis County Justice Center

Indicate your prisoner status:

- | | |
|---|---|
| <input checked="" type="checkbox"/> Pretrial detainee | <input type="checkbox"/> Convicted and sentenced state prisoner |
| <input type="checkbox"/> Civilly committed detainee | <input type="checkbox"/> Convicted and sentenced federal prisoner |
| <input type="checkbox"/> Immigration detainee | <input type="checkbox"/> Other (explain): _____ |

B. The Defendant(s)

To the best of your knowledge, give the information below for each defendant named in the caption of this complaint. Make sure the defendant(s) named below are the same as those listed in the caption of this complaint. Attach additional pages if necessary.

For an individual defendant, include the person's job title, and check whether you are suing the individual in his or her individual capacity, official capacity, or both.

Defendant 1

Name: Lt. Thompson Tim Fleen Lt.

Job or Title: Lt.

Badge/Shield Number: _____

Employer: St. Louis County

Address: 100 S. Central Ave, Clayton, MO

☒ Individual Capacity ☒ Official Capacity 63105

Defendant 3

Name: Lt. O'Bryan

8th Floor Lt.

Job or Title: Lt.

Badge/shield Number:

Employer: St. Louis County

Address: 100 S Central Ave, Clayton, MO 63105

☒ Individual Capacity ☒ Official Capacity

Defendant 2

Name: Lt. Stevenson 7th Floor Lt.Job or Title: Lt.

Badge/Shield Number: _____

Employer: St. Louis CountyAddress: 100 S. Central Ave, Clayton, MO
63105☒ Individual Capacity☒ Official Capacity

II. Statement of Claim

Type, or neatly print, a short and plain statement of the **FACTS** that support your claim(s). For every defendant you have named in this complaint, you must state what he or she personally did to harm you. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Do not make legal arguments, or cite court cases or statutes. You may attach additional pages if necessary.

Your statement of claim must include all of the following information:

1. What happened to you?
2. When did it happen?
3. Where did it happen?
4. What injuries did you suffer?
5. What did each defendant personally do, or fail to do, to harm you?

On 2/5/25 at approximately 8:20 AM my cell door in 7A was paper open (unlocked) I came out. I asked officer Murphy if I could go to the sallyport and wait to speak to Lt. Thompson about a cell change because I didn't feel safe where I was. She told me yes and that she would call out to unit control to let him know. At this time while sitting in the sallyport supervisor Lt. Stevenson observed me through the glass (take note in order to enter sallyport from 7A side it has to be unlocked by an officer) at this time officer Murphy partner officer MacCaskey opened 7A door and asked me to stop in. I told him officer Murphy gave me the ok to wait here for Lt. Thompson. At that time Lt. Stevenson

opened the salivary port door from the unit control side. Officer MacCaskey then told the Supervisor I had gotten a write up and was on Lockdown.

- Lt. Serenson immediately asked me to stand, face the wall and put my hands behind my back. I did as asked. She then placed wrist restraints on me hard and fast she did not do the second lock thing they do. I immediately told this Lt. the cuffs were too tight. She said once on the 8th floor (lockdown floor) she would check them.
- Lt. Serenson and Lt. Thompson escorted me to the 8th floor. once there I yelled the cuffs were too tight and could they please loosen them. They didn't deliberately indifferent
- Lt. Thompson then put me up against facing the wall he asked me to remove my shoes. I said could you please Loosen the cuffs. He didn't deliberately indifferent
- Lt. Thompson and Lt. O'Bryan pushed me hard against the wall while Lt. Serenson placed leg restraints on me. Moments later I was forcefully placed in the restraint chair while still rear-handcuffed. while strapped down I told the 3 Lt's that the cuffs were too tight again. over time my hands and arms lost feelings and fingers were numb
- Lt. O'Bryan was told by Medical staff Brad Huff that my hands was swollen and the cuffs were too tight

III. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

- Mental and emotional Injury
- Physical pain and suffering
- Permanent nerve damage to whole of left hand and zero feeling of left thumb

Next Page →

Statement of Claim

O' Bryan pretended to loosen cuffs from some location in back of chair. If he was going to loosen them as Medical asked he should have unstrapped me to get to the cuffs.

- O' Bryan was again told by medical staff Phillips that the cuffs were too tight.

Lt. O' Bryan said he was not checking them again he told me what I was feeling the chair is supposed to do that. I over and over to these Lt's about my painful condition before it caused injury. They ignored my complaints and medical advice. Hollering with pain for over 2 hours from the handcuffs and restricted position without access to toilet, which I told Lt. O' Bryan I had to use the restroom he ignored me nor an opportunity to clean up after soiling myself shows deliberately indifferent and inadequate training. This injurious practice by these Lt's of being rear-handcuffed and placed in restraint chair for hours is a severe and deleterious effect tantamount to punishment for a non-violent non-threatening conduct. was cruel punishment

- Lt. Stevenson placing excessively tight handcuffs and,

- Lt. Stevenson, Lt. Thompson and Lt. O' Bryan needlessly failing to loosen them when asked caused permanent injury.

- St. Louis County has an unconstitutional custom to place rear-handcuffed inmates in restraint chair for hours for non-violent non-threatening conduct as punishment. And the restraint chair as spots for restraining arms. Why not use them

I was removed from restraint chair around 2 hours later by Lt. O' Bryan and Lt. Slyer. Both Arms and hands swollen severely:

IV. Relief

State briefly and precisely what you want the Court to do for you. Do not make legal arguments. Do not cite any cases or statutes. If you are requesting money damages, include the amounts of any actual damages and/or punitive damages you are claiming. Explain why you believe you are entitled to recover those damages.

Award Compensatory damages in the amount of 75,000 against all defendants. Award punitive damages in the amount of 250,000 against all defendants. Award such other relief it may appear I'm entitled.

V. Exhaustion of Administrative Remedies/Administrative Procedures

The Prison Litigation Reform Act ("PLRA") 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

- A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?



Yes



No

If yes, name the jail, prison or other correctional facility where you were confined at the time of the events giving rise to your claim(s):

St. Louis County Jail

- B. Does the jail, prison or other correctional facility where your claim(s) arose have a grievance procedure?



Yes



No



Do not know

- C. If yes, does the grievance procedure at the jail, prison or other correctional facility where your claim(s) arose cover some or all of your claims?



Yes



No



Do not know

If yes, which claim(s)?

D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☒ Yes

☐ No

E. If you did file a grievance:

1. Where did you file the grievance?

St Louis County Jail

2. What did you claim in your grievance? (Attach a copy of your grievance, if available)

All Lts were Deliberately indifferent to my complaints
Didn't follow medical advice.
Injuries caused
inadequate training

3. What was the result, if any? (Attach a copy of any written response to your grievance, if available)

Grievance is not done on paper
asked case caseworker if they could
print copy No reply.

Asked unit leader for copy No reply.

VI. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

- A. To the best of your knowledge, have you ever had a case dismissed on the basis of this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case and when it was dismissed. Attach a copy of the court's order, if possible.

Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the state and county)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____
6. Is the case still pending?
- ☐ Yes
- ☐ No (If no, give the approximate date of disposition): _____
7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☐ Yes

☒ No *not about conditions*

- D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff _____

Defendant(s) _____

2. Court (if federal court, name the district; if state court, name the state and county)

3. Docket or case number _____

4. Name of Judge assigned to your case _____

5. Approximate date of filing lawsuit _____

6. Is the case still pending?

☐ Yes

☐ No. (If no, give the approximate date of disposition): _____

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

VII. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 15 day of April, 2025.

Signature of Plaintiff

VCCFL